

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 11-CR-20551

Plaintiff,

HON. ROBERT H. CLELAND

D-11 FREDERICK TILL JACKSON, a.k.a. "Big Fred,"
D-12 SARDAR ASHRAFKHAN, a/k/a "Dr. Khan,"
D-13 AHAB ELMADHOUN, R.Ph.,
D-14 WALEED YAGHMOUR, R.Ph.,
D-15 DEEPAK KUMAR,
D-16 JOHN STEPHEN CHECK, Sr.,
D-17 DAVID VEZZOSI,
D-18 DR. ADELFO PAMATMAT, M.D.,
D-19 DR. JOHN GERALT, D.O.,
D-20 DR. MALIK DABABNEH, M.D.,
D-21 DR. PAUL KELLY, M.D.,
D-22 DR. RAVI IYER, M.D.,
D-23 DR. MUHAMMAD AHMED,
D-24 TIMOTHY SPENCER, P.A.,
D-25 KRINA PATEL, R.Ph.,
D-26 SANJAY PATEL,
D-27 JAYSHRIBEN GANDHI, R.Ph.,
D-28 GUARANG GANDHI,
D-29 MOHAMMAD MIAN, a.k.a "Omar,"
D-30 FARAJ GHABAG,
D-31 JAVAR MYATT-JONES, a.k.a "Dr. Jones,"
D-32 TIFFANY WALKER, a/k/a "Mary Reed,"
D-33 SIERRA WALKER, a/k/a "Tosha,"
D-34 TONEY TAYLOR,
D-35 JIMMY FOSTER,
D-36 JAMES BLAKE,
D-37 TROY IVORY,
D-38 JACKIE RENEE IVORY,
D-39 ERIC HESTER,
D-40 ALFORNIA JOHNSON, a/k/a "Con", a/k/a "Alex" and "ShiCon,"
D-41 COREY WILLIAMS, a/k/a "CoCo,"
D-42 RONNIE MOSES, a/k/a "Red,"

D-43 PHILIP BURNETT, a/k/a “Frank”, and “Frank Burns,”
D-44 GARLAND ARTHUR HOLMAN, a/k/a “G-Boy,”
D-45 JAMALL GIBSON, a/k/a “Mal,”
D-46 FELCIA JACKSON,
D-47 AYESHA McCRAY,
D-48 CHERISH LEWIS,
D-49 ROBERT SCOTT DIALS,
D-50 WILLIE DAVID JACKSON, a/k/a “Lil’ Dave,”
D-51 LANCE HATTEN,
D-52 JOSH BARNES,
D-53 NATHAN REED, a/k/a “Reed,”
D-54 WILLIAM ASHLEY SMITH, a/k/a “Cash,”

Defendants.

FORFEITURE BILL OF PARTICULARS

NOW COMES the United States of America, by and through its counsel, BARBARA L. McQUADE, United States Attorney and GJON JUNCAJ, Assistant United States Attorney, and submits this Forfeiture Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to provide notice of specific property which the Government intends to forfeit. Pursuant to Title 21, United States Code, Section 853, and/or Title 18, United States Code, Sections 982(a)(7), 981(a)(1)(C) and Title 28, United States Code, Section 2461, the Defendants’ interests in the following property shall be forfeited upon conviction of Counts One and/or Two as charged in the Second Superseding Indictment:

Currency:

- 1) Five Hundred Sixty Three Thousand Four Hundred Sixty Two Dollars and Fifteen Cents (\$563,462.15) in U.S. Currency from Bank of America Account #5405528042;
- 2) Fifty Thousand Eight Hundred Eighty Five Dollars (\$50,885.00) in U.S. Currency from Bank of America Account #1665027009;

- 3) Sixteen Thousand One Hundred Fifty Six Dollars and Fifty Six Cents (\$16,156.56) in U.S. Currency from JP Morgan Chase Bank Account #360088704;
- 4) Twelve Thousand Seven Hundred Sixteen Dollars (\$12,716.00) in U.S. Currency which was seized from a home in Ypsilanti, Michigan;
- 5) Nine Hundred Sixty Six Dollars (\$966.00) in U.S. Currency which was seized from a home in Ypsilanti, Michigan;
- 6) Fifty Three Thousand One Hundred Fifty Dollars (\$53,150.00) in U.S. Currency from JP Morgan Chase Bank Safety Deposit Box #39-4;
- 7) Forty Six Thousand Nine Hundred Dollars (\$46,900.00) in U.S. Currency from Bank of America Safety Deposit Box #181;
- 8) Seventy Six Thousand Two Hundred Twenty-Seven Dollars and Fifty-Two Cents (\$76,227.52) in U.S. Currency from Fifth Third Bank Account #7912745366;
- 9) Fifty Three Thousand Six Hundred Seventy Two Dollars and Forty-Five Cents (\$53,672.45) in U.S. Currency from Key Bank Account #226811002386;
- 10) Eighty Six Thousand Dollars (\$86,000) in U.S. Currency from Fifth Third Bank Safe Deposit Box #183;
- 11) Sixteen Thousand Nine Hundred Six Dollars and Fifty Six Cents (\$16,906.56) in U.S. Currency from Bank of America Account # 375005556938;
- 12) Seventy Eight Thousand Six Hundred Seventy Dollars and Ninety Cents (\$78,670.90) in U.S. Currency from Citizens Bank Account #4534939841;
- 13) Ten Thousand Eight Hundred Eighty Five Dollars and Forty Cents (\$10,885.40) in U.S. Currency from Credit Union One Account #000004237077S38;
- 14) Twenty Two Thousand Eight Hundred Thirty Dollars (\$22,830) in U.S. Currency from Huntington National Bank Safe Deposit Box #63;
- 15) Five Thousand Nine Hundred Sixty One Dollars and Fifty Five Cents (\$5,961.55) from Bank of America Account #5403094591;
- 16) One Thousand Five Hundred Dollars (\$1,500) in U.S. Currency which was seized from a home in Macomb, Michigan;
- 17) Six Thousand Three Hundred Seven Dollars (\$6,307) in U.S. Currency which was seized from a business located on North Lilley Road, Canton, Michigan;

- 18) Eighteen Thousand Eight Hundred Dollars (\$18,800) in U.S. Currency from Comerica Bank Safe Deposit Box #12;
- 19) Eighteen Thousand Two Hundred Eighty Eight Dollars and Eighty Five Cents (\$18,288.85) in U.S. Currency from Comerica Bank Account #6822701196;
- 20) Fifteen Thousand Seven Hundred Sixty Four Dollars and Thirty Nine Cents (\$15,764.39) in U.S. Currency from Comerica Bank Account #9412046493;
- 21) Four Thousand Two Hundred Twenty Two Dollars and Thirty Nine Cents (\$4,222.39) in U.S. Currency from Comerica Bank Account #6823710170;
- 22) Seven Thousand Seven Hundred Twelve Dollars and Eighteen Cents (\$7,712.18) in U.S. Currency from Comerica Bank Account #1852630613;
- 23) One Hundred Twenty Seven Thousand Five Hundred Thirteen Dollars and Twenty Cents (\$127,513.20) in U.S. Currency from Chase Bank Account #941602989;
- 24) Nine Thousand Dollars (\$9,000) in U.S. Currency from Chase Bank Cashier's Check #9446001520;
- 25) Fifty Five Thousand Eight Hundred Forty Six Dollars and Eight One Cents (\$55,846.81) in U.S. Currency from JP Morgan Chase Bank Account #716396817;
- 26) Twenty Five Thousand One Hundred Four Dollars and Eighty Five Cents (\$25,104.85) in U.S. Currency from JP Morgan Chase Bank Account #2720366430;
- 27) Twenty Six Thousand Eighty Two Dollars and Eighty Three Cents (\$26,082.83) in U.S. Currency from JP Morgan Chase Bank Account #2921120610;
- 28) Two Thousand Fifty Dollars and Sixteen Cents (\$2,050.16) in U.S. Currency from JP Morgan Chase Bank Account #819275702; and
- 29) One Hundred Twenty Four Thousand Seven Hundred Fifty Nine Dollars and Sixty Two Cents (\$124,759.62) in U.S. Currency from Charter One Bank Account #4512843263.

Vehicles:

- 1) One (1) 2009 Toyota Camry LE, VIN: 4T1BE46K19U880749;
- 2) One (1) 2009 Ford F250 XLT, VIN: 1FTSW21Y39EA08312;

- 3) One (1) 2007 Land Range Rover, VIN: SALME15407A253658;
- 4) One (1) 2011 Chevrolet Camaro, VIN: 2G1FK3DJ1B9181376; and
- 5) One (1) 2002 BMW 745i, VIN: WBAGL63442DP50551.

Jewelry:

- 1) Assorted Jewelry (Valued at \$19,500).

Gold Coins/Bars:

- 1) 70 Assorted .999 Fine Gold Canadian Coins from JP Morgan Chase Bank Safety Deposit Box #39-4;
- 2) 30 Assorted .999 Fine Gold One Ounce Canadian Fifty Dollar Coins from JP Morgan Chase Bank Safety Deposit Box #321; and
- 3) 92 Assorted .999 Fine Gold Canadian Coins and .999 Fine Gold Bars from Bank of America Safety Deposit Box #181.

This Forfeiture Bill of Particulars incorporates all other property listed in the Second Superseding Indictment, including the notice of the forfeiture money judgment contained therein. Such notice neither limits the Government from seeking the forfeiture of additional specific property nor limits the Government from seeking the forfeiture of substitute assets pursuant to Title 21, United States Code, Section 853(p).

Respectfully submitted,

BARBARA L. McQUADE
United States Attorney

s/Gjon Juncaj
GJON JUNCAJ
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(P63256)

Dated: March 22, 2013

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2013, the foregoing document was electronically filed with the Clerk of the Court using the ECF system which will send notification to all ECF participants.

s/Gjon Juncaj
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